PRIVACY POLICY

Welcome to Doon, a development of MMM Transportation ("MMM/DOON," "we", "us," or "our"). MMM/DOON provides its services to you, including its data management, data storage and data processing services (collectively, the "Services"), through the mmm-transport.com website ("Website"). The Website and the Services are collectively referred to herein as the "Platform". The Platform is owned and operated by MMM/DOON.

This privacy policy (the "Privacy Policy") describes the ways in which MMM-Transport.com, a development by MMM Transport, a Massachusetts limited liability company ("MMM" "MMM Transport", "MMM Transportation" "we", "us", or "our") collects, uses, and shares information from or about you while you are access the Website or use the Platform. MMM respects the privacy of the individuals that use the Platform, and this Privacy Policy describes how MMM uses the data it collects or receives from users of the Platform. This Privacy Policy addresses Personal Data that falls into the scope of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation ("GDPR"), which is included as Exhibit A. This Privacy Policy also addresses Personal Data that falls into the scope of the California Consumer Privacy Act of 2018 (CCPA), which is included as Exhibit B.

Your information, including Personal Data (as defined herein), will be stored in the United States.

Information on Privacy

The United States federal government and technology industry have developed practical tips to help you guard against Internet fraud, secure your computer and protect your Personal Data. For more information on tips and safety to help you guard against Internet fraud, see <u>https://www.usa.gov/online-safety</u>.

Information Collected

Personal Data

If you use the Platform, Personal Data about you may be collected and/or processed by MMM and its employees. "Personal Data" means any information relating to an identified or identifiable individual ("Data Subject"); who can be identified, directly or indirectly, in particular by reference to an identifier such as, but not limited to, a name, email address or an online identifier. If you create an account on the Platform, MMM will collect certain information in server logs such as: your name, email address, and URL of your website and in some instances, title, street address, city, state, country, postal code, and telephone number, and any other information useful to MMM's products and services, if you provide it to us. If you send correspondence to us such as emails, MMM will collect such information, including any Personal Data, in a file specific to you. In general, if you intentionally provide us with Personal Data, MMM will collect it. MMM is also collecting on-line identifiers, such as an on-line identifiers of authors of public social media posts about products.

From time to time, MMM may request other Personal Data in order to provide features, functions or services, but you will always have the choice to decide whether or not to provide the requested information. If you access the restricted access portions of the Platform, you may be required to provide additional Personal Data.

Non-Identifiable Information

Additionally, MMM collects and compiles information relating to your use of the Platform which does not constitute Personal Data, such as time, date, browser type, browser language, operating system, and domain name of your internet service provider (collectively, the "Non-Identifiable Information") as part of the operation of the Platform or during the course of your activities on or use of the System.

MMM may use "cookies" and similar technologies such as bots in connection with operation of the Platform to help MMM to personalize and tailor its services and improve the quality of those services by tracking and storing user preferences, trends and patterns. If you visit any restricted access or password protected portions of the Platform, you may be required to use cookies, which may include or be linked to Personal Data. Cookies are small pieces of information that are stored on your computer by the Platform server. The use of cookies is common in the industry, and they are used at most major websites. You may customize your browser to automatically inform you whenever a cookie is to be used or refuse all cookies but doing so may impair or prevent the performance of certain functions of the Platform, and may not permit access to some areas of the Platform. For more information on cookies, see http://www.cookiecentral.com/faq.htm.

MMM uses cookies to allow authentication in restricted access or password protected portions of the Platform. This allows MMM to personalize or regulate the use of the Platform, and also permits MMM to automate the access and data-entry functions of the Platform (e.g., login information).

In general, MMM does not use cookies to track the navigational habits of identified users without the user's consent. If you visit the Platform only to read or download content, much of the information MMM does collect is only statistical (e.g., the domain from which you access the Internet, the date and time you access the Platform, and the Internet address of the website from which you linked directly to the Platform) and is not personally identifiable. MMM uses this information about the number of visitors and their use of the Platform in aggregate form to make the Platform more useful and attractive to you.

Certain information, like archive threads, may be collected by MMM as a result of the links displayed as a result of a search query on the Platform. MMM uses this information to understand and improve the quality of the Platform and related technology including the accuracy and efficiency of the Platform.

By using the Platform (which resides in part on servers located in the United States), you unambiguously consent to any collection, processing, transfer or use of any Personal Data. If you

do not consent to any collection, processing, transfer, or use of such information, please discontinue use of the Platform.

Collecting and Using Information

With regard to an account you decide to create on the Platform, MMM will use Personal Data for the purpose for which you provided it. For instance, if you registered on the Platform, MMM uses your Personal Data to provide you any alerts or feeds that you requested MMM send you. If you provide Personal Data in a search query, MMM uses that Personal Data to provide you search results. If you correspond with us and include Personal Data, MMM uses the Personal Data to respond to you. MMM uses your information to provide you customer support. In this respect, MMM always reserves the right to contact you about your account or customer service issues.

Generally, the Non-Identifiable Information is used to provide better services to users and to improve the Platform.

In nearly all cases, the above-described data may be collected or processed by, and transferred to, MMM's facilities in the United States. This may be done through the Platform's Internet Service Provider (ISP) or through the use of such tools as Google Analytics. This information is gathered to improve the quality of MMM's services and MMM's ability to market those products and services to specific individuals and organizations that could benefit from them. The Platform uses Google Analytics in accordance with the Google Privacy Policy (http://www.google.com/policies/privacy).

Location Information

When you use the Platform, MMM collects and processes information about your actual location. MMM uses various technologies to determine location, including IP address, GPS, and other sensors that may, for example, provide the Platform with information on Wi-Fi access points and cell towers.

Sharing Information

Non-Identifiable Information and Personal Data about you is disclosed and shared with advertisers, business partners, sponsors and other third parties under the following limited circumstances: MMM may disclose the frequency of visits to the Platform by the average user, information to third parties assisting us in carrying out a transaction or providing a service for you (e.g., packaging, sending and delivering purchases and information to you, clearing transactions, or performing statistical analyses of MMM's services, performing promotional services and training services), or in connection with merger and acquisition discussions.

MMM may share data, including Personal Data about you, with MMM's affiliates, partners, subsidiaries and companies or individuals who provide services on behalf of MMM. To the extent that these entities have access to your Personal Data, they will have agreed with MMM to follow

our Privacy Policy or already have privacy practices substantively no less protective than MMM's practices described in this document, to the extent allowed by applicable law.

MMM will release information, including Personal Data, in connection with any valid law, regulation, or legal process (such as a search warrant, subpoena, statute or court order). MMM may disclose Personal Data to protect or enforce the rights, property or safety of MMM, its users or other third parties including the disclosure of information with other companies and organizations relating to fraud protection and credit risk reduction.

MMM may provide Personal Data to MMM's trusted businesses or persons to process it for us, based on MMM's instructions and in compliance with MMM's Privacy Policy and any other appropriate confidentiality and security measures.

Generally, and except as indicated at the time of collection, MMM does not sell or lease any Personal Data about you to any third party. However, MMM may aggregate information (gather up data across all user accounts) in a manner that creates Non-Identifiable Information and disclose such information to advertisers and other third parties for other marketing and promotional purposes. In these situations, MMM does not disclose to these entities any Personal Data.

You may choose to opt-out from allowing MMM to provide Non-Identifiable Information to certain partners. Visit networkadvertising.org, aboutads.info, and jumptap.com to make informed decisions about your online and mobile privacy and to opt-out.

In the event that MMM is or substantially all of its assets are sold or otherwise transferred, all information MMM has about you may be included in the transferred assets.

Other Uses of Information

On the secure portion of the Platform, your login information and password are considered confidential. However, this information may be shared if it is necessary to comply with applicable laws, or to assist law enforcement officials and/or the court and judicial system.

Security

MMM uses commercially reasonable technical, physical, operational and procedural safeguards to protect Personal Data from loss, misuse, altercation, and unauthorized access or disclosure. Due to the nature of MMM's business, including its dependence on the public Internet, MMM cannot ultimately ensure that private communications and Personal Data will not be intercepted by third parties or otherwise obtained in ways not described in this Privacy Policy. Although MMM attempts to protect the privacy of users, MMM cannot absolutely guarantee that such information will remain private while utilizing the public website. While no security measure can guarantee against compromise, MMM regularly reviews and updates its security measures in an effort to provide appropriate security for all information held by MMM.

Children

MMM takes children's privacy seriously and does not knowingly collect, use or disclose Personal Data from children and is committed to complying with all applicable laws and requirements, such as the United States Children's Online Privacy Protection Act (COPPA). MMM encourages all parents and guardians to instruct their children in the safe and responsible use of Personal Data on the Internet. The Platform is not intended for or directed at children or persons under the age of 21, and MMM does not knowingly collect information from children or persons under the age of 21. MMM asks children or persons under the age of 21 not to use the Platform. MMM has implemented age check verification measures to prevent access to the website but cannot be held responsible for unauthorized false data input.

Information Update

If you would like to update your information in any way, please log into your account and modify it there, or contact us at <u>inquiries@mmm-transport.com</u>

Links

The websites, advertisements and messages linked to by MMM are developed, published, and operated by third parties over whom MMM exercises no control. Since MMM does not control these websites, MMM encourages you to review the privacy statement posted on these (and all) third party websites. MMM is not responsible for the privacy statements or practices of websites and services controlled by other companies or organizations.

Data Retention

MMM will not retain your Personal Data longer than is necessary for the purpose it was collected.

Your Consent and Changes to the Privacy Policy

MMM reserves the right to change, modify or update the terms of this Privacy Policy at any time without notice. MMM posts the revised Privacy Policy on the Platform and indicates the date of the current statement below, so you know when it was last updated. If the changes are material, if possible and in MMM's sole determination, MMM will give you reasonable advance notice and an opportunity to review the changes before they become effective. If you do not agree to the revised terms and conditions of the Privacy Policy, stop using the Platform. Continued use of the Platform after any such revision or modification constitutes your acceptance of the Privacy Policy as so revised or modified.

Feedback

If you have questions regarding MMM's Privacy Policy, please email them to: <u>inquires@mmm-transport.com</u> or contact us by mail:

MMM Transport 376 Easthampton Rd. Northampton, MA 01060

Exhibit A

Processing Personal Data According to GDPR

In case processing of your Personal Data falls within the scope of the GDPR, then MMM shall perform such processing in accordance with GDPR requirements. Therefore, in addition to the above terms, MMM provides you with the following information:

- (a) You are entitled to:
 - **Request access** to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
 - **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
 - **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- (b) With respect to Personal Data collected as a result of the account a Data Subject decided to create on the Platform, then consent is the legal basis for processing. With respect to Personal Data collected by MMM from public social media posts, such processing is based on a legitimate interest. MMM, when collecting Personal Data from public social media posts about products, aims at deriving insights from public consumer opinion through social media data. Personal Data collected in this way helps understand current trends in consumer attitudes and associated market opportunities. Given that social media data at stake is publicly available, collecting thereof by MMM shall meet the consumers' reasonable expectation of privacy and shall constitute one of the least intrusive ways of gathering public opinion data. Moreover, it is common amongst consumers to expect to receive a response from a brand within 24 hours after posting about their product or service on a public social media website. To be responsive and transparent, modern companies need to be able to search and monitor public social media data for terms related to their brands and products and collecting of Personal Data by MMM helps them achieve this goal.
- (c) You will not have to pay a fee to access your Personal Data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- (d) We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- (e) We try to respond to all legitimate requests within one (1) month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- (f) MMM does not perform automated decision-making, including profiling.
- (g) Unless necessary and legally permissible, MMM does not intend to transfer Personal Data to a third country or international organization.
- (h) You may at any time lodge a complaint with a supervisory authority located in the European Union having jurisdiction over processing; and
- (i) If you wish to exercise any of the rights set out above, please contact <u>inquiries@mmm-</u> <u>transport.com</u>

Exhibit B

Privacy Notice for California Residents

Effective Date: April 1, 2021

This Privacy Notice for California Residents supplements and is expressly made part of the information contained in MMM's Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this Notice.

Information We Collect

The Platform collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, the Platform has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Collected
A. Identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ.	
Code § 1798.80(e)).	YES
C. Protected classification characteristics under California or federal law.	NO
D. Commercial information.	YES
E. Biometric information.	NO
F. Internet or other similar network activity.	YES
G. Geolocation data.	YES
H. Sensory data.	NO
I. Professional or employment-related information.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20	
U.S.C. Section 1232g, 34 C.F.R. Part 99)).	NO
K. Inferences drawn from other personal information.	YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the California Confidentiality of Medical Information Act ("CMIA") or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act ("FRCA)", the Gramm-Leach-Bliley Act ("GLBA") or California Financial Information Privacy Act ("FIPA"), and the Driver's Privacy Protection Act of 1994.

MMM obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Platform.
- Directly and indirectly from activity on the Platform. For example, from submissions through our Platform portal or Platform usage details collected automatically.
- From third party business partners such as analytics providers.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop the Platform, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience with the Platform and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through the Platform, third party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of the Platform, and MMM's products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve the Platform and MMM's products and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of MMM's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by MMM about MMM's users, clients or customers is among the assets transferred.

MMM will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

MMM may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Our affiliates.
- Service providers.
- Data aggregators.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Sales of Personal Information

In the preceding twelve (12) months, Company has not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that MMM disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that MMM delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the

information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at: <u>inquiries@mmm-transport.com</u>
- Sending a letter to us at MMM Transport, 376 Easthampton Rd. Northampton, MA 01060
- Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of the Platform that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to <u>inquiries@mmm-transport.com</u>

Changes to Our Privacy Notice

MMM reserves the right to amend this privacy Notice at our discretion and at any time. When we make changes to this privacy Notice, we will post the updated Notice on the Platform and update the Notice's effective date. Your continued use of the Platform following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this Notice, the ways in MMM collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: inquiries@mmm-transport.com

Postal Address: MMM Solutions Group 376 Easthampton Rd. Northampton, MA 01060